



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JN/DKK
F. #2017R05903

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 25, 2019

By Email and ECF

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Michael Levy
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Sidley Austin LLP

David Bitkower
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Re: United States v. Huawei Technologies Co., Ltd., et al.
Criminal Docket No. 18-457 (S-2) (AMD)

Dear Counsel:

Enclosed please find the government's twelfth production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019. See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendant.

I. The Government's Discovery

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
Financial Institution Documents, Including Customer Account Information, and Written Correspondence	Discovery Material	DOJ_HUAWEI_A_0001385101- DOJ_HUAWEI_A_0001387751 DOJ_HUAWEI_A_0001428207- DOJ_HUAWEI_A_0001440473
Financial Institution Documents, Including Customer Account Information, and Written Correspondence	Sensitive Discovery Material ("SDM")	DOJ_HUAWEI_A_0001441325- DOJ_HUAWEI_A_0001444845
Communications related to Huawei Employees in Iran	Discovery Material	DOJ_HUAWEI_A_0001387752- DOJ_HUAWEI_A_0001428206
Communications related to Huawei Employees in Iran	SDM	DOJ_HUAWEI_A_0001444846- DOJ_HUAWEI_A_0001451568
Documents related to export compliance	Discovery Materials	DOJ_HUAWEI_A_0001440474- DOJ_HUAWEI_A_0001441324

Very truly yours,

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cc: Clerk of the Court (AMD) (by ECF) (without Enclosures)